

**BAKER & HOSTETLER LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: [dsheehan@bakerlaw.com](mailto:dsheehan@bakerlaw.com)  
Nicholas J. Cremona  
Email: [ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)  
Dean D. Hunt  
Email: [dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

---

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

---

In re:

BERNARD L. MADOFF,

Debtor.

---

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Estate of Bernard  
L. Madoff,

Plaintiff,

v.

NORMA SHAPIRO, individually and in her capacity  
as Trustee for the Norma Shapiro Revocable

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04486 (SMB)

Declaration of Trust Under Agreement Dated 9/16/2008 and the Trust Under Will of Philip L. Shapiro; NORMA SHAPIRO DECLARATION OF TRUST UNDER AGREEMENT DATED 9/16/2008, REVOCABLE TRUST; TRUST UNDER WILL OF PHILIP SHAPIRO; and MARTIN ROSEN, in his capacity as Trustee of the Trust Under Will of Philip L. Shapiro,

Defendants.

**THIRD AMENDED CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures deadline has passed.
2. The Fact Discovery deadline has passed.
3. The Disclosure of Case-in-Chief Experts shall be due: July 31, 2015.
4. The Disclosure of Rebuttal Experts shall be due: September 8, 2015.
5. The Deadline for Completion of Expert Discovery shall be: December 1, 2015.
6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before January 27, 2016.
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before February 11, 2016.
8. The Deadline for Conclusion of Mediation shall be: On or before June 10, 2016.

Dated: New York, New York  
May 20, 2015

Of Counsel:

Dean D. Hunt  
**BAKER & HOSTETLER LLP**  
811 Main, Suite 1100  
Houston, Texas 77002  
Telephone: 713.751.1600  
Fax: 713.751.1717  
Email: dhunt@bakerlaw.com

/s/ Nicholas J. Cremona

David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Nicholas J. Cremona  
Email: ncremona@bakerlaw.com  
**BAKER & HOSTETLER LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: 212.589.4200  
Fax: 212.589.4201

*Attorneys for Irving H. Picard, Trustee for  
the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Estate  
of Bernard L. Madoff*